

UNITED STATES DISTRICT COURT

for the

District of _____

United States of America)

v.)

Case No. 09-589 (M)

CARLOS SIMON-TIMMERMAN)

Defendant)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date of 8/11/09 in the county of Carolina in the Judicial District of Puerto Rico, the defendant violated 18 U. S. C. § 2252(a)(4)(B) and 2252(a)(1), an offense described as follows:

The defendant herein knowingly possessed one or more matters which contained visual depictions of a minor engaging in sexually explicit conduct, and such visual depictions had been transported using any means of facility of interstate or foreign commerce or in or affecting foreign commerce, or were produced using materials which had been mailed or so shipped or transported, and the producing of such visual depictions involved the use of a minor engaging in sexually explicit conduct and were of such conduct; that is: the defendant herein, knowingly possessed images, in video format contained in a digital video disk, of actual minors engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2).

The defendant herein knowingly transported, using any means of facility of interstate or foreign commerce or in or affecting foreign commerce, visual depictions of a minor engaging in sexually explicit conduct, and the producing of such visual depictions involved the use of a minor engaging in sexually explicit conduct and were of such conduct; that is: the defendant herein, knowingly transported images, in video format contained in a digital video disk, of actual minors engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2). All in violation of Title 18, United States Code, Sections 2252(a)(1) and 2252(a)(4)(B).

This criminal complaint is based on these facts:

See attached Affidavit.

☐ Continued on the attached sheet.

Reviewed by
AUSA Tere Hernandez
8/12/2009

[Signature]
Complainant's signature

Alek Pacheco, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

8/12/09

SAN JUAN, PUERTO RICO

City and state:

[Signature]
Judge's signature
MARCOS E. LÓPEZ, U.S. MAGISTRATE JUDGE
Printed name and title

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